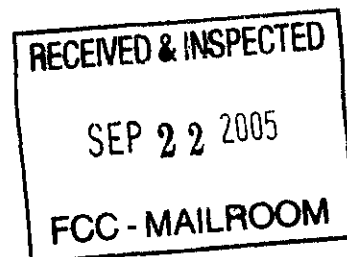


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September 15, 2005

DOCKET FILE COPY ORIGINAL

VIA CERTIFIED US MAIL

Federal Communications Commission
Attn: Commission Secretary
445 12th St. SW
Washington, DC 20554

**Re: VoIP E-911 Compliance
WC Docket No. 05-197**

Our File No. PHLV0982-001

Dear Sir or Madam,

My law firm represents ComVoice, Inc. of Phoenix, Arizona. Pursuant to the First Report and Order and Notice of Proposed Rule Making adopted by the FCC on May 19, 2005, I am submitting this letter demonstrating that my client is compliant with all rules governing Voice Over IP (VoIP) providers for E911 services.

At present, ComVoice:

- Transmits all 911 calls, as well as a call back number and the caller's registered location for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's registered location and that has been designated for telecommunications carriers under section 64.3001 of the Commission's rules. The calls are routed through the use of ANI via the dedicated Wireline E911 Network, and the registered location is available from or through the ALI Database.
- Has a program in place to obtain, and facilitate the updating of, customer location information.
- Does not require that subscribers "opt-in" or "opt-out" of 911 services and notifies its subscribers of the limitations of their 911 service offerings.
- Obtains from each customer, prior to the initiation of service, the physical location at which the service will first be utilized.

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- Provides end users one or more methods to update information regarding the user's physical location if the service can be utilized from more than one location.
- Provides E911 services as outlined in the FCC requirements as a condition to providing that service to a customer.
- Specifically advises every subscriber, both new and existing, prominently and in plain language, the circumstances under which E911 service may not be available through interconnected VoIP service or may be in some way limited by comparison to traditional E911 service.
- Maintains a record of affirmative acknowledgment by every subscriber, both new and existing, of having received and understood the E911 advisory.
- Distributes to all subscribers, both new and existing, warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructs the subscriber to place them on and/or near the CPE used in conjunction with the interconnected VoIP service.

If there are any further inquiries necessary regarding my client, please contact me directly at (602) 631-9100 X114 or Mr. Erik Knight at 602-424-9900.

Sincerely,

ELLIS & VENABLE



Lance C. Venable
Attorney at Law

LCV/roc

cc: Mr. Erik Knight